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July 23, 2025

BY ECF

The Honorable Rachel P. Kovner
United States District Court Judge
Eastern District of New York
225 Cadman Plaza
Brooklyn, New York 11201

Re: United States v. Angel Almeida; 21 Cr. 613 (RPK)

Dear Judge Kovner:

As the Court is aware, I represent Angel Almeida in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A. After conferring with AUSAs Chand Edwards-Balfour and Tara McGrath yesterday, I write jointly with the Government to respectfully request a two-week extension to respond the Court’s Order, dated July 21, 2025.

On July 21, 2025, the Court, in light Dr. Miriam Kissin’s forensic report, dated July 18, 2025, directed the parties to submit letters by today, “stating their position on whether the Court should determine that defendant Angel Almeida is incompetent and not restorable to competency in the foreseeable future and whether an in-person or virtual hearing should be held to address this question.” I am currently traveling for work and am unable to address this question now. Further, additional time is necessary as it is important that defense expert, Dr. Xavier Amador, be afforded the opportunity to confer with Dr. Kissin and the treatment staff at FMC Devens, and that I may in turn consult with Dr. Amador.

The parties agree with the Court’s recommendation that Angel remain designated to FMC Devens until the Court determines how to proceed.

Finally, the parties believe time from the speedy trial clock is automatically excluded as Angel is still going through the process of medical treatment and evaluation to determine whether they are competent to stand trial.

Accordingly, I respectfully request that the Court grant the parties an extension until August 6, 2025 to respond to the Court’s July 21, 2025 Order.

Thank you for your consideration.

Respectfully submitted,

/s/

Anthony Cecutti, Esq.